

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

(1) JANICE BUSH, as Special)
Administrator of the Estate)
of Ronald Garland, deceased,)
Plaintiff,)
-vs-) No. 19-CV-00098-GKF-FHM
(2) BRET BOWLING, in his)
individual and official)
capacity as Sheriff Creek)
County, Okla., et al.,)
Defendants.)

DEPOSITION OF *KERRI JANES*, taken on behalf of
the plaintiff pursuant to the following stipulations,
on the 30th day of December, 2019, at 907 South
Detroit, Tulsa, Oklahoma, before Kellie Erwin,
Certified Shorthand Reporter in and for the State of
Oklahoma.

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1 CPR."

2 So they moved him from the chair to the floor
3 and we got the emergency bag and started chest
4 compressions, rescue breathing and applied AED
5 pads.

6 Q. Before all of that, do you recall the correctional
7 staff that was working up front that night?

8 A. That was working the shift?

9 Q. Yes.

10 A. Labbee, Fulks, Fetters.

11 Q. Did you observe any of those correctional officers
12 trying to irritate or antagonize Ronald Garland?

13 A. When I was in there I didn't really.

14 Q. Did you witness Fetters throwing water on Ronald
15 Garland?

16 A. No, not that I recall.

17 Q. Did you ever hear Ronald Garland banging on the
18 door?

19 A. Yes.

20 Q. Did you hear Ronald Garland asking for water, that
21 his mouth was on fire?

22 A. No.

23 Q. Is he able to get water or get a drink while he's
24 in the detox cell without the assistance of
25 officers or somebody else?

1 A. If he brings his cup back with him, but there's no
2 fountain or whatever.

3 Q. Yeah. There's no running water in there; right?

4 A. Right.

5 Q. He's got to bring the water with him inside the
6 cell or somebody needs to bring him some; right?

7 A. Yes.

8 Q. Did you ever find out or hear that Fetters had
9 thrown water on Garland?

10 MR. WINTER: Other than anything that I would
11 have told you.

12 A. I think somebody might have asked me at some point,
13 but, I mean, I didn't see it.

14 Q. (By Mr. Terrill) Okay. Did you ever have a
15 conversation with Fetters about doing it?

16 A. Not that I remember.

17 Q. Obviously what I mean by that is, did you have a
18 conversation with Fetters about him throwing the
19 water on Ronald Garland?

20 A. Not that I can remember.

21 Q. Okay. Did you ever recall Fetters having -- and I
22 know this is the next question, just indulge me.
23 Did you ever have a conversation where Fetters
24 explained why he would have thrown water on Ronald
25 Garland?

1 A. Not that I can remember.

2 Q. Is there any reason why you know of that Fetters
3 would be throwing water on Ronald Garland?

4 A. Not that I know of.

5 Q. Is there any medical benefit to throwing water on
6 Ronald Garland?

7 A. Not that I know of.

8 Q. When you met with Ronald Garland, was that in your
9 medical office?

10 A. Yes.

11 Q. Who else was there? Anybody else present?

12 A. Yeah. Day shift was a female; Foster. I don't
13 remember her first name.

14 Q. Was she there just sort of kind of keeping an eye
15 on the inmate?

16 A. Yeah. And I mean once he was out of the cell I
17 was, like, "Somebody has got to stay." Like, the
18 more people around, the kind of more he kind of
19 acted, so once we figured out he wasn't going to,
20 like, attack one of us, they kind of sat back and
21 we were able to speak with him. And then once we
22 were done, I was, like, "I don't think I got a lot
23 of info."

24 Q. He seemed antsy around the guards?

25 A. Yeah, a lot of people. Like, just more people, it